

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JAIME VALENZUELA, ANNABELLE
IBANEZ, ESMERALDA ALFARO,
ARNOLD CASAS, PAULA CASAS,
ROBERT SHIPP, MARIA SHIPP, MIGUEL
LOPEZ, HERSHAL FRAZIER, ISAAC
ROCHA, JACKIE ROCHA and LOUIE
GONZALEZ,

Plaintiffs

VS.

REDMAN HOMES, INC. A/K/A REDMAN
HOUSING, TITAN HOMES, INC.,
OAKMAN HOMES, INC. D/B/A
OAKWOOD MOBILE HOMES, INC.,
SOUTHERN HOMES, PALM HARBOR
HOMES D/B/A MASTERPIECE
HOUSING, CLAYTON HOMES, INC.,
SOUTHERN ENERGY HOMES, INC.,
SOUTHERN LIFESTYLE HOMES, INC.,
BELMONT HOMES, INC. D/B/A
MS BELMONT HOMES, INC., DANE
ENERGY D/B/A THE HOMEPORT,
LUV MOBILE HOME SALES,
CIT GROUP SALES AND FINANCE,
HOMES BY OAKWOOD, VALUE
HOUSING, INC., OAKWOOD
ACCEPTANCE, CORP., GREENPOINT
CREDIT, L.L.C. D/B/A GREENPOINT
CREDIT, INC., VANDERBILT
MORTGAGE & FINANCE, INC.,
NATIONS CREDIT AND HOUSING, INC.
UNITED COMPANY FUNDING, INC.,
and GREENTREE FINANCIAL
SERVICING CORP.

Defendants

United States District Court
Southern District of Texas
FILED

SEP 03 1999

Michael N. Milby, Clerk

Cause No. C-99-351

NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendants, Clayton Homes, Inc., Luv Mobile Home Sales, and Vanderbilt Mortgage and Finance, and respectfully remove this Court Cause No. 99-08-37833, styled *Jamie Valenzuela, et al. v. Redman Homes, Inc. a/k/a Redman Housing, et al.*, now pending in the 79th Judicial Court of Jim Wells County, Texas. Removal is proper for the following reasons:

Plaintiffs, at the time of the commencement of the state court action, and at the present time, are individuals and residents of the State of Texas.

Defendants, Clayton Homes, Inc., at the time of the commencement of the state court action, and at the present time, is a corporation duly incorporated and existing under and by virtue of the laws of the State of Tennessee with its principal office in Marysville, Tennessee, and is, therefore, a citizen of the State of Tennessee.

This Court has original jurisdiction of this cause under 28 U.S.C. § 1331, because the civil causes of action involve a federal question. Venue is proper in this Court as the district and division embracing the place where the state action was pending pursuant to 28 U.S.C. § 1441(a).

This Court has original jurisdiction of this cause under 28 U.S.C. § 1332 because certain Defendants have been fraudulently joined to defeat diversity. Those not fraudulently joined are not citizens of the State of Texas. Thus, complete diversity exists under 28 U.S.C. § 1332(a)(2) between the Plaintiffs and the properly joined Defendants. As shown in the Plaintiff's original petition alleges the amount in controversy to be \$100,000 per individual Plaintiff.

The Defendants will give written notice of the filing of this Notice to all parties and/or their attorneys of record, and will file a copy of this Notice with the Clerk of the District Court of Jim Wells County, Texas. A copy of all process, pleadings and orders served upon the Defendants is

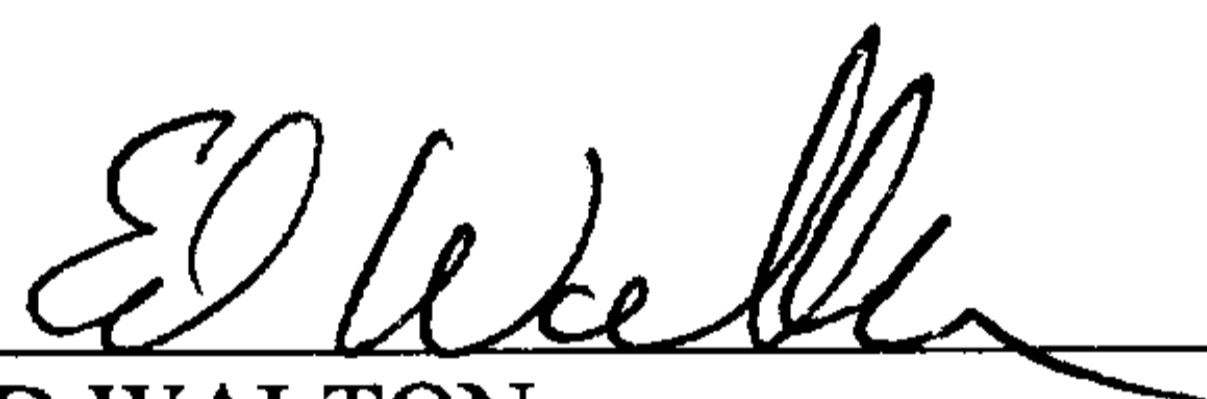
attached hereto, as well as all papers filed with the state court from which removal is sought.

Attached is the Docket Sheet from the state court from which removal is sought, an index of matters being filed, and a list of all counsel of record, including addresses, telephone numbers, and parties represented.

WHEREFORE, Defendants, Clayton Homes, Inc., Luv Mobile Home Sales, and Vanderbilt Mortgage and Finance, pray that this Court assume jurisdiction of this cause as if it had been originally filed here, and that further proceedings in state court be stayed. These Defendants further pray for other and further relief to which they may show themselves justly entitled.

Respectfully submitted,

CLAYTON HOMES, INC., LUV MOBILE
HOME SALES, AND VANDERBILT
MORTGAGE AND FINANCE, INC.,
DEFENDANTS

A handwritten signature in black ink, appearing to read "Ed Walton", is written over a horizontal line.


ED WALTON
SBN: 20828550

Law Offices of Ed Walton
8300 Douglas, Ste. 800
Dallas, Texas 75225
(214) 706-9325

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has this day been forwarded to Hector P. Gonzales, P.O. Box 3728, Alice, Texas 78333 by certified mail, return receipt requested.

Signed this 28th day of September, 1999.
2nd


ED WALTON

No Fee Required for Filing

Date Printed: 08/31/99 - Time: 10:52:42

Event/Calendar/Reporting

Event Associated With Case: 99-08-37833-CV

Date Filed: 08/16/99

JAIME VALENZUELA, ET AL

REDMAN HOMES, INC. a/k/a REDMAN HOUSING, ET AL

Event Date	Post Desc	Event	No- Descr	Minute Disposition	Vol. Loc.	Page
08/16/99	DISTR	CRIS PET				
			***	ALT'S CRIS PETITION	***	
08/16/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD TO REDMAN HOMES, INC., ET AL/DELV BY C.M.	***	
08/17/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD TO TITAN HOMES OF MISSISSIPPI/DELV BY C.M.	***	
08/17/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD TO SOUTHERN ENERGY HOMES A/K/A SOUTHERN LIFESTYLES/DELV BY CM	***	
08/17/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD TO DANE ENERGY D/A/A THE HOMEPORT/DELV BY CM	***	
08/17/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD LUV MOBILE HOME SALES./DELV BY C.M.	***	
08/17/99	DISTR	CIT MAIL		ISD		
			***	CIT ISD TO GREENPOINT CREDIT, INC.	***	
08/17/99	DISTR	CERTIFICATE				
			***	CERT. OF SERV BY CM TO REDMAN, SOUTHERN ENERGY, TITAN, DANE, LUV AND GREENPOINT	***	
08/20/99	DISTR	RET RECEIPT		SRVD		
			***	SRVD ON LUV MOBILE HOME SALES BY V J BLANKENSHIP	***	
08/24/99	DISTR	MT TRANSFER				
			***	MT TRANS & SUBJ THERETO, CRIS AND OF CLAYTON HOMES, LUV SALES, & VANDERBILT MORT.	***	
08/24/99	DISTR	RET RECEIPT		SRVD		
			***	RECEIPT RETURNED SERVED 08/19/99 ON DANE ENERGY BY PAUL ROTH I 260-855-713	***	
08/24/99	DISTR	RET RECEIPT		SRVD		
			***	RECEIPT RETURNED SRVD 08/20/99 ON GREEN POINT CREDIT BY L. CONRAD P349-682-638	***	
08/24/99	DISTR	RET RECEIPT		SRVD		
			***	RECEIPT RETURNED SERVED 08/20/99 ON NATIONS CREDIT HOME EQUITY P349-682-639	***	
08/24/99	DISTR	RET RECEIPT		SRVD		
			***	RECEIPT RETURNED SERVED 08/20/99 ON REDMAN HOMES BY C.T. CORP P280-630-284	***	

08/18/99 DISTRI MT BE 1-

DEFENDERS: JENNIFER WEST, LUV HOMES SALES, VANDERBILT MORTGAGE, TO CONSIDER ABATEMENT

08/25/99 DISTRI FIAT

* * * FIAT, SENT TO JUDGE ON DEFS' MT BEVERANCE * * *

08/26/99 DISTRI PLEA IN ABAT

* * * DEFS' CLAYTON HOMES, LUV HOMES SALES, VANDERBILT MORT. FILE PLEA IN ABATEMENT * * *

Date Printed: 08/31/99 - Time: 10:52:43

Event/Calendar/Reporting

Event Associated With Case: 99-08-37833-CV

Date Filed: 08/18/99

JAIME VALENZUELA, ET AL

REDMAN HOMES, INC. a/k/a REDMAN HOUSING, ET AL

Event	Date	Post	Event	Descr	Disposition	Time	Loc.	Vol.	Page
08/26/99	DISTRI	RET RECEIPT	SRVC						
* * * RECEIPT RETURNED SERVED 08/23/99 ON JENNIFER WEST 2290-955-712 * * *									
08/27/99	DISTRI	MT TRANSFER							
* * * DEFENDERS TRANS VEN, SUBJECT THERETO, 1ST AMEND AND DEFS' CLAYTON, LUV, & VANDERBILT * * *									
08/30/99	DISTRI	RET RECEIPT	SRVC						
* * * RET REC-8/26/99 TITAN HOMES OF MISS. * * *									

Calendars Associated With Case: 99-08-37833-CV

Calendar	Date	Reason	Remarks

No Calendar Records In File

Date Printed: 08/31/99 - Time: 10:52:43

Monthly Reporting

Trial Court Case Monthly Report Records

Case Number: 99-08-37833-CV

JAIME VALENZUELA, ET AL

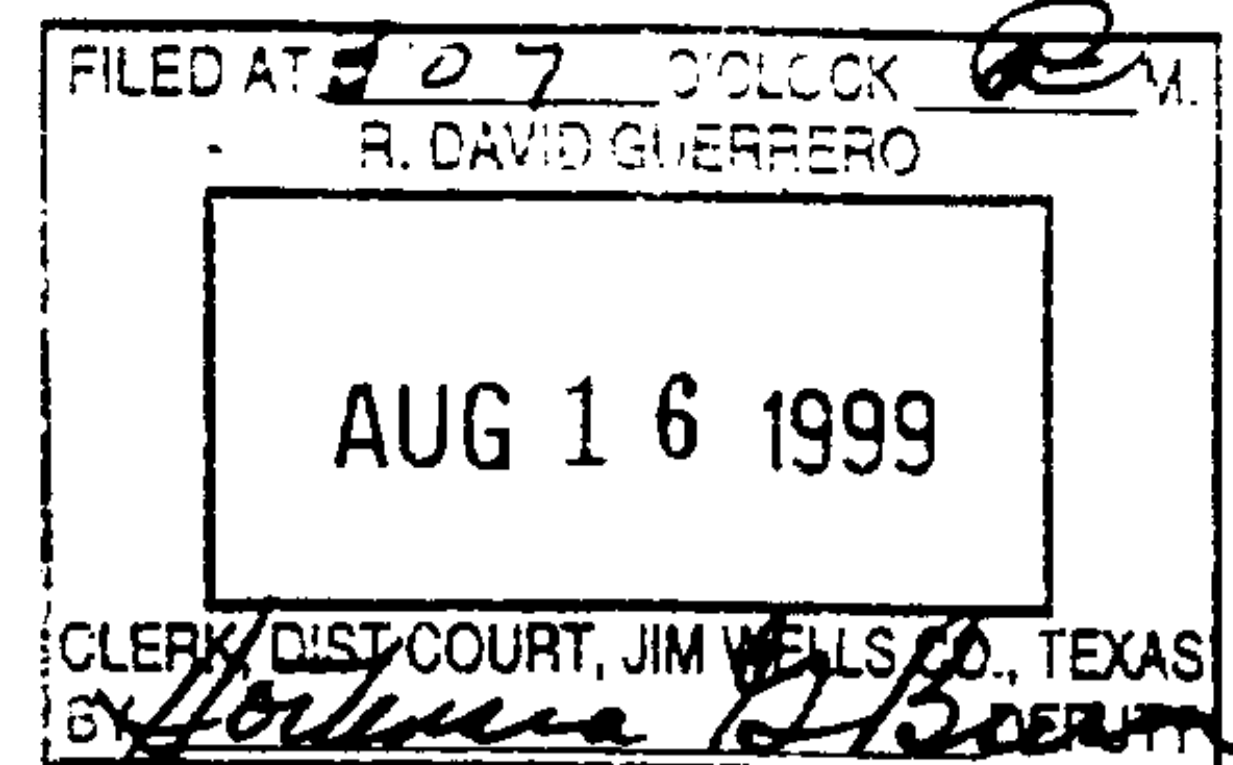
REDMAN HOMES, INC. a/k/a REDMAN HOUSING, ET AL

Date Filed: 08/18/99

Case Type: CONTRACT

Date Disposed: / /

Disposition Type:

CAUSE NO. 99-08-37833

JAIME VALENZUELA, et al

§
§
§
§
§
§
§

IN THE DISTRICT COURT

VS.

79th JUDICIAL DISTRICTREDMAN HOMES, INC. a/k/a REDMAN
HOUSING, et al

JIM WELLS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION

COME NOW, Jaime Valenzuela, Annabelle Ibanez, Esmeralda Alfaro, Arnold Casas, Paula Casas, Robert Shipp, Maria Shipp, Miguel Lopez, Hershal Frazier, Isaac Rocha, Jackie Rocha, Louie Gonzalez, hereinafter called Plaintiffs complaining of Redman Homes, Inc., a/k/a Redman Housing, Titan Homes, Inc., Oakwood Homes, Inc., d/b/a Oakwood Mobile Homes, Inc., Southern Homes, Palm Harbor Homes d/b/a Masterpiece Housing, Clayton Homes, Inc., Southern Energy Homes, Inc., Southern Lifestyle Homes, Inc., Belmont Homes, Inc., d/b/a MS Belmont Homes, Inc., Dane Energy d/b/a The Homeport, Luv Mobile Home Sales, CIT Group Sales and Finance, Homes by Oakwood, Value Housing, Inc., Oakwood Acceptance, Corp., Greenpoint Credit, L.L.C. d/b/a Greenpoint Credit, Inc., Vanderbilt Mortgage & Finance, Inc., Nations Credit and Housing, Inc., United Company Funding, Inc., Greentree Financial Servicing Corp., Crestpoint abandoned Assumed Name. CIT Group Sales and Finance, Inc., BankAmerica Housing, A Division of Bank of America, F.S.B.

II.
VENUE

Plaintiffs are residents in Jim Wells County, Texas. Venue is proper in Jim Wells County, Texas because the breach of warranty of consumer goods was in Jim Wells County, Texas.

Defendants Redman Homes, Inc., a/k/a Redman Housing, Oakwood Homes, Inc., d/b/a Oakwood Homes, Inc., Palm Harbor Homes, Clayton Homes, Inc., Belmont Homes, Inc. d/b/a MS

Defendant Nations Credit Home Equity Service, P.O. Box 150270, Ft. Worth, Texas 76108.

III.
FACTUAL BACKGROUND

Plaintiffs herein are all purchasers of manufactured homes. Individually each of the Plaintiffs herein purchased their mobile home because it was represented to each of them that it was a good investment. They were each told that the home would appreciate in value. They were all assured that their homes were constructed in a good and workmanlike manner with materials of the highest quality. They were all promised that the homes would be installed in a professional manner as the results of all the aforementioned representations, each of the Plaintiffs herein executed what they thought was a retail installment contract and committed their purchasing power to the purchase of said homes.

In return for the representations that were made to them, the Plaintiffs agreed to make the monthly payments called for in their contracts for the periods specified. They did this because they believed and relied on the representations made to them by the manufacturers, retailers and financing institutions, that are the Defendants herein.

Time has shown that the representations were false and untrue and that the Plaintiffs were, by said deceptions, gotten to execute the retail installment contract that affected them pecuniarily.

IV.

Plaintiffs will prove to this court and jury that on a day, the exact date unknown to the Plaintiffs, that the Defendants herein acting alone and/or together entered into a conspiracy to manufacture, retail and finance the mobile homes purchased by the Plaintiffs herein. That the Defendants were at all times, cognizant that the purchase of said mobile home was not a good investment, that they did not appreciate in value. That knowing all these facts, the Defendants acting

together and/or alone created the atmosphere and the situation in which the Plaintiffs purchased the aforementioned mobile home to their detriment.

The acts and/or omissions of the Defendants herein, acting together or alone was a conspiracy to:

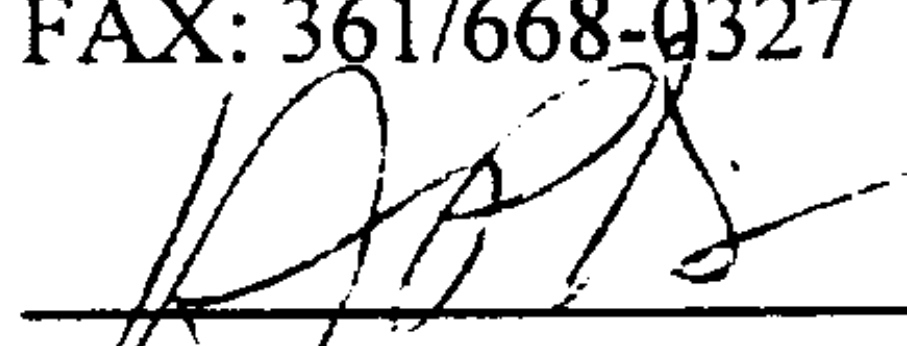
- A. defraud the Plaintiffs herein;
- B. get by deception the Plaintiffs herein to execute the retail installment contract tying up the Plaintiffs credit and obligating the Plaintiffs to make monthly payments for a designated period;
- C. to collect interest from the Plaintiffs that was usurious;
- D. violate express or implied warranties of consumer products;
- E. violate the deceptive trade practices act; and
- F. violate various sections of the Texas Penal Code.

V.

The acts and/or omissions was the proximate and/or producing cause of Plaintiffs' damages which amount to \$100,000 per individual Plaintiff.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants be cited to appear and answer herein and upon final trial hereto, Plaintiffs have judgment against Defendants for actual damages as provided, statutory penalties, pre and post judgment, interest at the rate provided by law, for fraud in an amount to be determined at trial and for such other and further relief to which Plaintiffs may show themselves justly entitled, all of which exceed the minimal jurisdictional limits of this Honorable Court.

Respectfully submitted,
HECTOR P. GONZALEZ LAW OFFICE
P.O. Box 3728
Alice, Texas 78333
TEL: 361/668-0325
FAX: 361/668-0327



Hector P. Gonzalez
SBN: 08127000

COUNTY OF JIM WELLS

ALICE, TEXAS 78333

R. DAVID GUERRERO

CLERK, DISTRICT COURT
P. O. DRAWER 2219
(512) 666-8717

VIOLA R. RAMIREZ
CHIEF DEPUTY

CERTIFICATE OF SERVICE BY
CERTIFIED MAIL:

DATE: AUGUST 17, 199

NAME: GREENPOINT CREDIT L.L.C. d/b/a GREENPOINT CREDIT, INC.

ADDRESS: BY SERVIN REGIS ANT. LEXIS DOC. SERV. 905 CONGRESS AVE.
Austin, /Tx. 78701

RECEIPT FOR CERTIFIED MAIL NUMBER : RETURNED DATE:

NAME: Nations Credit Home Equity Serv.

ADDRESS: P.O. Box 15027 Ft. 1

RECEIPT FOR CERTIFIED MAIL NUMBER: P 349-682-6

NAME:

ADDRESS:

RECEIPT FOR CERTIFIED MAIL NUMBER:

NAME:

ADDRESS:

RECEIPT FOR CERTIFIED MAIL NUMBER:

NAME:

ADDRESS:

RECEIPT FOR CERTIFIED MAIL NUMBER:

BY: Celia E. Perez
DEPUTY

P 349 682 639

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	NATION CREDIT HOMES EQ
Street & Number	P.O. BOX 150270
Post Office, State, & ZIP Code	

P 349 682 638

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	GREENPOINT CREDIT, L.L.C.
Street & Number	d/b/a GREENPOINT CREDIT
Post Office, State, & ZIP Code	BY SERVIN LEXIS DOC. SERV. 905 CONGRESS AVE. AUSTIN, TX.
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date

99-08-37833
8-17-99

PS Form 3800, April 1995

COUNTY OF JIM W
ALICE, TEXAS 78333

R. DAVID GUERRERO

CLERK, DISTRICT COURT
 P. O. DRAWER 2219
 (512) 466-3717

**CERTIFICATE OF SERVICE BY
 CERTIFIED MAIL:**

DATE: AUG. 17, 1999
 NAME: REDMAN HOMES, INC. a/k/a REDMAN HO

ADDRESS: BY SERVING CT.CORP SYSTEMS, 350 N.

RECEIPT FOR CERTIFIED MAIL NUMBER : P 280-630-284

NAME: SOUTHERN ENERGY HOMES a/k/a SOUTHE

ADDRESS: HWY. 41 NORTH ADDISON, AL

RECEIPT FOR CERTIFIED MAIL NUMBER: Z 260-855-712

NAME: TITAN HOMES OF MS

ADDRESS: TITAN HOMES OF MS 10194 LORRAINE

RECEIPT FOR CERTIFIED MAIL NUMBER: P 280-630-285

NAME: DANE ENERGY d/b/a THE HOMEPORT BY SE

ADDRESS: 1400 E. HWY. 359 MATHIS,

RECEIPT FOR CERTIFIED MAIL NUMBER: Z 260-855-713

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

**LUV MOBILE HOME SALES BY
 SERV. LUV MOBLE HOME SALES
 1708 HOUSTON HWY.
 VICTORIA, TX. 77901**

Article Number (Copy from service label)
Z 260-858-660

Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery RIA

C. Signature X [Signature] 60

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

99-08-37833

102595-99-M-1789

P 280 630 284

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to REDMAN HOMES, INC. a/k/a
 Street & Number

Z 260 855 712

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to SOUTHERN ENERGY HOMES
a/k/a SOUTHERN LIFESTYLE HOMES
BY SERVING WINDEL L. BATCHELOR
 Street & Number HIGHWAY 41 NORTH

P 280 630 285

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to TITAN HOMES OF MS
 Street & Number BY SERV. REGIS. AGNT
 Post Office, State, & ZIP Code TITAN HOMES OF MS- 10194
PORT

Z 260 855 713

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to DANADANE ENERGY d/b/a THE
 Street & Number HOMEPORT BY SERV.
 Post Office, State, & ZIP Code ROBERT B. BOTH

Z 260 858 660

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to LUV MOBILE HOMES SALES
 Street & Number 1708 HOUSTON, HWY.

Post Office, State, & ZIP Code VICTORIA, TX. 77901

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date

99-08-37833
 8-17-99

PS Form 3800, April 1995

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____

in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____

Cause of failure to execute this citation is _____

FEEES serving 1 copy

Sheriff/constable _____ County, TEXAS

Total _____ \$ _____

By _____ Deputy

Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.

Executed at _____ in _____ County, Texas at _____

_____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____

_____ defendant, in person, a

true copy of the Citation together with the accompanying _____ copy(ies) of the _____

Petition attached thereto and I endorsed on said copy of this Citation the date of delivery

To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas

By _____

Process Server

Authorized Person - Printed Name _____

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas

in and for _____

Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAI ME VALENZUELA, ET AL

va.
REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT

79th JUDICIAL DISTRICT

of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 19 99

R. DAVID GUERRERO District Court

By _____ Deputy

Do not mark below
(For Clerk's File Mark)

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____ in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____ Cause of failure to execute this citation is: _____

FEES serving 1 copy _____ Sheriff constable _____ County, TEXAS
Total\$ _____ By _____ Deputy
Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.
Executed at _____ in _____ County, Texas at _____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____ defendant, in person, a true copy of the Citation together with the accompanying _____ copy(ies) of the _____ Petition attached thereto and I endorsed on said copy of this Citation the date of delivery.
To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas
By _____
Process Server

Authorized Person - Printed Name _____
SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas
in and for _____
Commission expires: _____

ORIGINAL
File No. 99-08-37833
JAIME VALENZUELA, et al
vs.
REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al
Citation for Personal Service
IN DISTRICT COURT
79th JUDICIAL DISTRICT
of Jim Wells County, Texas
Issued
This 17 day of AUG. A. D. 1999
R. DAVID GUERRERO
Clerk District Court
by _____ Deputy
Do not mark below
(For Clerk's File Mark)

ORIGINAL

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____

in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____

Cause of failure to execute this citation is: _____

FEES serving 1 copy _____ Sheriff/constable _____ County, TEXAS

Total \$ _____ By _____ Deputy

Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.

Executed at _____ in _____ County, Texas at _____

_____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____

defendant, in person, a

true copy of the Citation together with the accompanying _____ copy(ies) of the _____

Petition attached thereto and I endorsed on said copy of this Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas

By _____
Process Server

Authorized Person - Printed Name _____

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas

in and for _____

Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAI ME VALENZUELA, ET AL

vs.
REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT
79th JUDICIAL DISTRICT
of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 19 99

R. DAVID GUERRERO
Clerk District Court

By *Celia E. Perez* Deputy

Do not mark below
(For Clerk's File Mark)

OK 9/1/99

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____

in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____

Cause of failure to execute this citation is _____

FEES serving 1 copy

Sheriff constable _____ County, TEXAS

Total _____ \$ _____

By _____ Deputy

Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.

Executed at _____ in _____ County, Texas at _____

_____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____

defendant, in person, a

true copy of the Citation together with the accompanying _____ copy(ies) of the _____

Petition attached thereto and I endorsed on said copy of this Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas

By _____

Process Server

Authorized Person - Printed Name

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas

in and for _____

Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAIMÉ VALENZUELA, et al

vs.

REDMAN HOMES, INC. a/k/a

REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT

79th JUDICIAL DISTRICT

of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 1999

R. DAVID GUERRERO

Clerk District Court

By Celeste Lopez Deputy

Do not mark below
(For Clerk's File Mark)

ORIGINAL

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____
in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____
Cause of failure to execute this citation is _____

FEES serving 1 copy _____ Sheriff constable _____ County, TEXAS
Total _____ S _____ By _____ Deputy
Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.
Executed at _____ in _____ County, Texas at _____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____ defendant, in person, a true copy of the Citation together with the accompanying _____ copy(ies) of the _____
Petition attached thereto and I endorsed on said copy of this Citation the date of delivery.
To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas
By _____
Process Server

Authorized Person - Printed Name _____
SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas
in and for _____
Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAI ME VALENZUELA, ET AL

vs.
REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT

79th JUDICIAL DISTRICT

of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 19 99

R. DAVID GUERRERO District Court

By *Charles E. Perez* Deputy

Do not mark below
(For Clerk's File Mark)

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____ in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____ Cause of failure to execute this citation _____

FEES serving 1 copy _____ Sheriff constable _____ County, TEXAS
Total \$ _____ By _____ Deputy
Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____ on the _____ day of _____, 19____.
Executed at _____ in _____ County, Texas at _____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____ defendant, in person, a true copy of the Citation together with the accompanying _____ copy(ies) of the _____ Petition attached thereto and I endorsed on said copy of this Citation the date of delivery To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas
By _____ Process Server

Authorized Person - Printed Name _____
SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas
in and for _____
Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAIMÉ VALENZUELA, ET AL
vs.
REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT
79th JUDICIAL DISTRICT
of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 1999

R. DAVID GUERRERO District Court

By Celia E. Lopez Deputy

Do not mark below
(For Clerk's File Mark)

CAF#1

COUNTY: JIM WELLS
OFFICE RECEIPT

9

FINE	
CRIM JUST. FEES	
COUNTY ATTORNEY	
SHERIFF	
CONSTABLE	
JUSTICE OF PEACE	
DISTRICT CLERK	
COUNTY CLERK	431.00
COUNTY JUDGE	
COPIES	
DEPOSITS	City 5.00
TRUST FUND	
LAW LIBRARY FEE	
OTHER	State 40.00
TOTAL	476.00

STATE OF TEXAS
County of Jim Wells



RECEIPT 151116 B

RECEIVED OF Hector Gonzalez
four hundred seventy six
cost Deposit
FOR STATE OF TEXAS, OR
Jaine Valenzuela et al
Redman Homes
VERSUS
R. DAVID GUERRERO DISTRICT CLERK
JIM WELLS COUNTY
OFFICER
Eusebio Segura
DEPUTY

INSTRUCTIONS: THIS FORM IS TO BE ISSUED IN DUPLICATE. THE ORIGINAL TO BE DETACHED AND GIVEN TO THE PAYEE AND THE COPY TO BE RETAINED IN THE BOOK FOR THE USE OF THE COUNTY AUDITOR. NO ERASURES ARE TO BE MADE ON THIS FORM IF AN ERROR IS MADE. THE RECEIPT IS TO BE VOIDED AND THE ORIGINAL LEFT IN THE BOOK.

DEFENDANT'S ATTORNEY:

REQUESTS THE ISSUANCE OF: CITATION(S)
PRECEPT(S)
SUBPOENA(S)
SUMMONS

SIGNATURE:

NAME(S) Redman Homes, Inc. aka Redman Housing
Titan Homes
Southern Energy Homes aka Southern Lifestyle Homes
Dane Energy dba Homeport
Luv Mobile Home Sales
Greenspoint Credit U.C. dba Greenspoint Credit Inc.
Nations Credit Home Equity Service
ADDRESS Address in Petition
Address in Petition
Address in Petition
Address in Petition
Address in Petition
Address in Petition
Address in Petition

HOW IS SERVICE TO BE PERFECTED?
RETURN TO ATTORNEY BY MAIL: ☒
REQUEST FOR CERTIFIED MAIL: ☒
TO SHERIFF FOR SERVICE:
PROCESS SERVER TO PICK-UP/ NAME:
PLEASE CALL WHEN READY: 668-0325

476.00

RETURN TO OFFICER

Came to hand the _____ day of _____, 19____, at _____ o'clock ____M., and executed (not executed) on the _____ day of _____, 19____, by delivering to _____

in person a true copy of this Citation, upon which I endorsed the date of delivery, together with the accompanying copy of the _____

Cause of failure to execute this citation is _____

FEES serving 1 copy _____

Sheriff/constable _____ County, TEXAS

Total \$ _____

By _____ Deputy

Fees paid by: _____

AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____, on the _____ day of _____, 19____.

Executed at _____ in _____ County, Texas at _____

_____ o'clock ____M., on the _____ day of _____, 19____ by delivering to _____

_____ defendant, in person, a

true copy of the Citation together with the accompanying _____ copy(ies) of the _____

Petition attached thereto and I endorsed on said copy of this Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 19____

_____ County, Texas

By _____
Process Server

Authorized Person - Printed Name _____

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on _____ day of _____, 19____.

Notary Public - State of Texas

in and for _____

Commission expires: _____

ORIGINAL

File No. 99-08-37833

JAI ME VALENZUELA, ET AL

REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Citation for Personal Service

IN DISTRICT COURT

79th JUDICIAL DISTRICT

of Jim Wells County, Texas

Issued

This 17 day of AUG. A. D. 1999

R. DAVID GUERRERO District Court

By _____ Deputy

Do not mark below
(For Clerk's File Mark)

THE STATE OF TEXAS

ORIGINAL

TO: LUV MOBILE HOMES SALES
 BY SERVING LUV MOBILE HOME SALES
 1708 HOUSTON, HWY.
 VICTORIA, TEXAS 77901

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

AUGUST A.D. 19 99

By **DAVID GUERRER** Clerk District Court, Jim Wells County, Texas
 P. O. Drawer 2219
 Alice, Texas 78332

By

Celia E. Perez

Deputy



ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332

Rule 106 of the Rules of Civil Procedure shall be served by the officer delivering to each defendant, in person, a true and correct copy of the petition and citation, and with a copy of the petition attached thereto.

THE STATE OF TEXAS

ORIGINAL

TO: GREENPOINT CREDIT, L.L.C.
d/b/a GREENPOINT CREDIT, INC.
BY SERVING REGISTERED AGENT
LEXIS DOCUMENT SERVICES, INC.
905 CONGRESS AVE.
AUSTIN, TEXAS 78701

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

AUGUST A.D. 19 99

By **DAVID GUERRERO** (Clerk, District Court, Jim Wells County, Texas)
P. O. Drawer 2219
Alice, Texas 78332

By

Celia E. Perez

Deputy



ATTORNEY FOR PLAINTIFF:
HECTOR P. GONZALEZ
P.O. BOX 3728
ALICE, TX. 78332

Rule 106. The citation shall be signed by the officer delivering to each defendant in person, and shall be signed by the officer delivering to each defendant by mail, and shall be endorsed thereon and with a copy of the petition attached thereto.

THE STATE OF TEXAS**ORIGINAL**

TO: NATIONS CREDIT HOME EQUITY SERVICE
 P.O. BOX 15027
 - FT. WORTH, TEXAS 76108

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

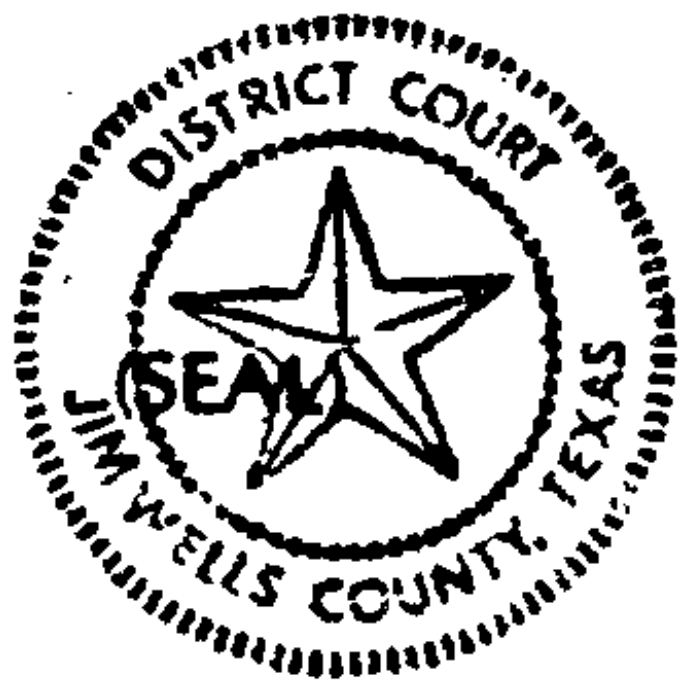
AUGUST A.D. 19 99

AR: DAVID GUERRERO Clerk, District Court, Jim Wells County, Texas
 P. O. Drawer 2219
 Alice, Texas 78332

By

Celia E. Perez

Deputy.



ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332

Rule 10b. This citation shall be served by the officer delivering to each defendant in person a true and correct copy of the citation and petition, and with a copy of the petition attached thereto.

THE STATE OF TEXAS**ORIGINAL**

TO: TITAN HOMES OF MISSISSIPPI, INC.
 - BY SERVING REGIS. AGENT TITAN
 HOMES OF MISSISSIPPI, INC.
 10194 LORRAINE ST.
 GULF PORT, MISSISSIPPI 39503

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

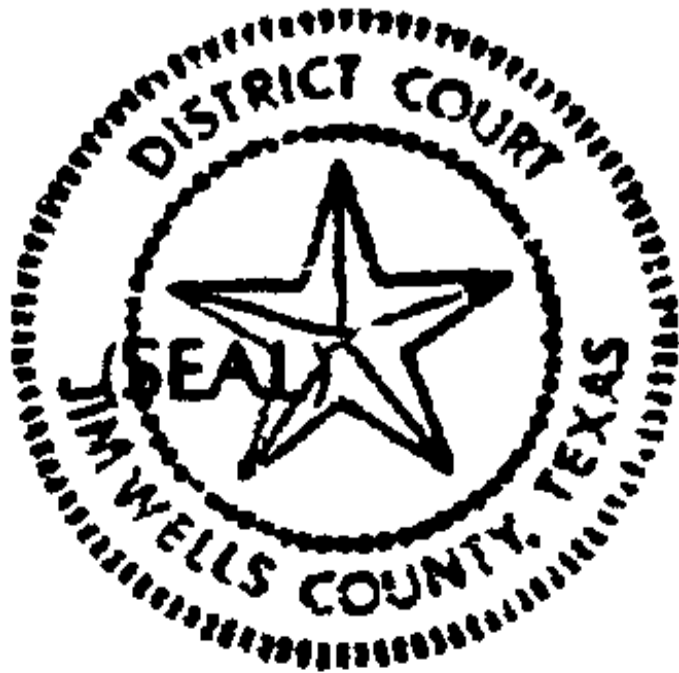
AUGUST A.D. 19 99

Attest: **R. DAVID GUERRE**, Clerk, District Court, Jim Wells County, Texas
 P. O. Drawer 2219
 Alice, Texas 78332

By

Celia E. Perez

Deputy.



ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

THE STATE OF TEXAS

ORIGINAL

TO: SOUTHERN ENERGY HOMES a/k/a
 - SOUTHERN LIFESTYLE HOMES, INC.
 BY SERVING REGISTERED AGENT
 WINDEL L. BATCHELOR
 HIGHWAY 41 NORTH,
 ADDISON, AL 35540

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

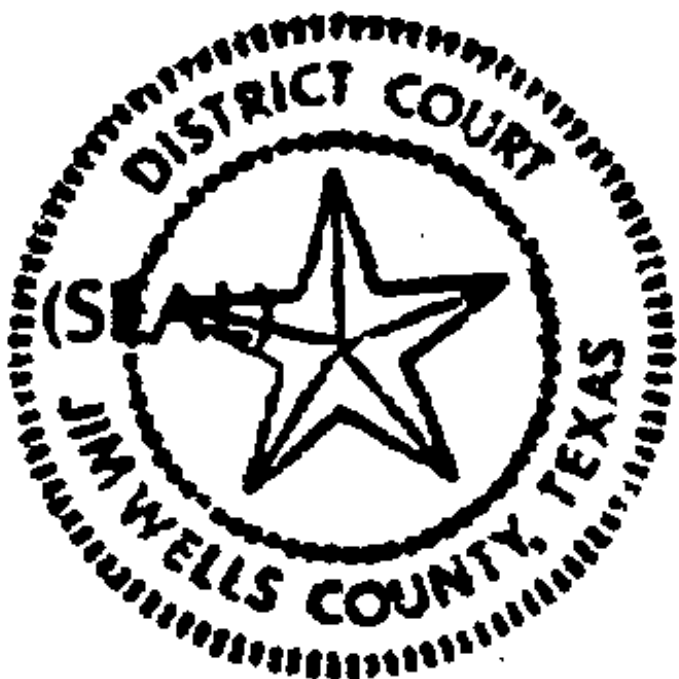
PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

AUGUST A.D. 19 99

AR: DAVID GUERRERO Clerk, District Court, Jim Wells County, Texas
 P. O. Drawer 2219
 Alice, Texas 78332

By Celeste Perez Deputy.



ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332

Rule 106: The citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto.

THE STATE OF TEXAS ORIGINAL

TO: REDMAN HOMES, INC., a/k/a
 REDMAN HOUSING, BY SERVING
 REGISTERED AGENT C.T. CORP. SYSTEMS
 350 N. ST. PAUL ST.
 DALLAS, TEXAS 75201

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

19 99 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

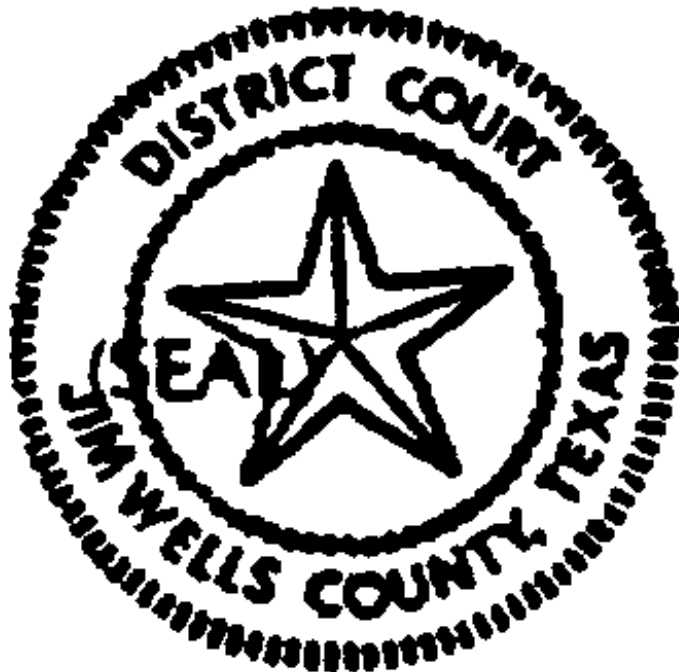
AUGUST A.D. 19 99

Attest: **DAVID GUERRERO** Clerk, District Court, Jim Wells County, Texas
 P. O. Drawer 2219
 Alice, Texas 78332

By

Celia E. Perez

Deputy.



ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332

Rule 106: "The citation shall be served by the officer delivering to each defendant in person a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

THE STATE OF TEXAS**ORIGINAL**

TO: DANE ENERGY d/b/a THE HOMEPORT
 BY SERVING REGISTERED AGENT
 - PAUL ROBERT ROTH
 1400 E. HWY. 459
 MATHIS, TEXAS 78368

Defendant, Greetings:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition a default judgment may be taken against you.

Said Plaintiff's Original Petition was filed in said court, on the 16 day of AUGUST A.D.

1999 in this cause, numbered 99-08-37833 on the docket in the 79th Judicial District Court of Jim Wells County, Alice, Texas, and styled,

JAIME VALENZUELA, et al

Plaintiff.

VS.

REDMAN HOMES, INC. a/k/a
 REDMAN HOUSING, et al

Defendant,

The nature of Plaintiff's Demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this citation, and made a part hereof.

PLAINTIFF'S ORIGINAL PETITION

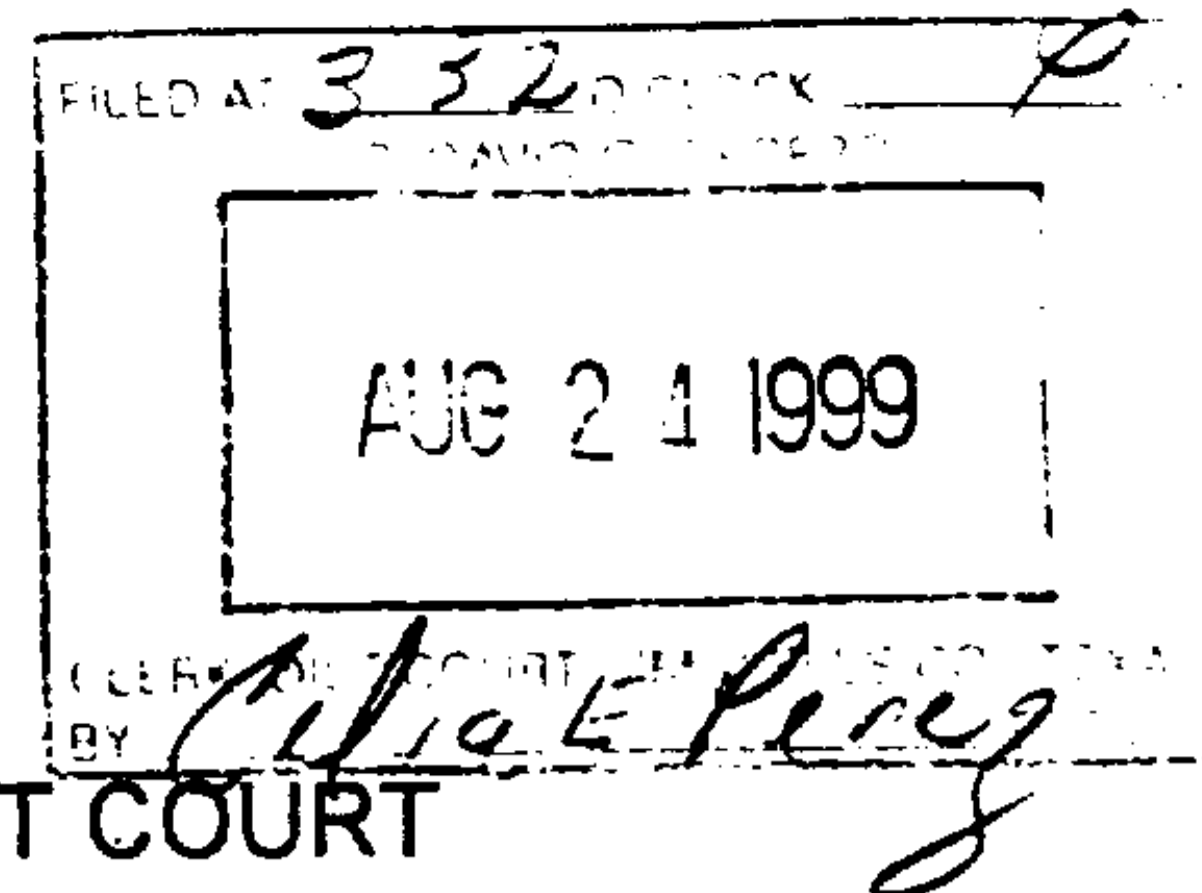
Issued and given under my hand and the seal of said Court at Alice, Texas, this the 17 day of

AUGUST A.D. 1999

By **DAVID GUERRERO** (Clerk, District Court Jim Wells County, Texas)
 P.O. Drawer 2219
 Alice, Texas 78332

By Celia E. Perez Deputy.

ATTORNEY FOR PLAINTIFF:
 HECTOR P. GONZALEZ
 P.O. BOX 3728
 ALICE, TX. 78332



CAUSE NO. 99-08-37833

JAMIE VALENZUELA, et al.

§
§
§
§
§
§

IN THE DISTRICT COURT

VS.

79TH JUDICIAL DISTRICT

REDMAN HOMES, INC a/k/a REDMAN
HOUSING, et al.

JIM WELLS COUNTY, TEXAS

**MOTION TO TRANSFER VENUE AND, SUBJECT THERETO, ORIGINAL
ANSWER OF CLAYTON HOMES, INC., LUV MOBILE HOME SALES
AND VANDERBILT MORTGAGE AND FINANCE, INC.**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendants, Clayton Homes, Inc., Luv Mobile Home Sales, and Vanderbilt Mortgage and Finance, who files this Motion to Transfer Venue, and subject thereto, their Original Answer, and in support thereof would show as follows:

1. The Defendant would show that there is no mandatory or permissive venue provision which would allow venue of this cause of action in Jim Wells County.

2. All or a substantial part of the alleged events or omissions in question did not occur in Jim Wells County.

3. The Defendant does not reside in Jim Wells County, Texas or did so at the time this cause of action allegedly accrued.

4. The Defendant does not have their principal office in Jim Wells County, Texas.

5. The Defendant, Clayton Homes, Inc., has its principal office in Marysville, Tennessee. It's principal office in this State is in Comal County, Texas.


6. The Defendant would show that this cause of action should be transferred to Comal County, Texas.

7. These Defendants hereby enters a general denial as authorized by the Texas Rules of Civil Procedure.

8. The Defendants specifically reserve the right to amend their answer to include any other defenses, affirmative defenses and/or counter-claims which it deems necessary.

WHEREFORE, the Defendants respectfully request that the Plaintiffs take nothing by this suit and for such other and further relief, both at law and in equity, to which the Defendant may be justly and legally entitled.

Respectfully Submitted,
Law Offices of Ed Walton
8300 Douglas, Suite 800
Dallas, Texas 75225
(214) 706-9325


Ed Walton
SBN: 20828550

Certificate of Service

- This is to certify that a true and correct copy of the above and foregoing has this day been forwarded to Hector P. Gonzales, P.O. Box 3728, Alice, Texas 78333.

Signed this 20th day of August, 1999.


Ed Walton

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JAIME VALENZUELA, ANNABELLE
IBANEZ, ESMERALDA ALFARO, ARNOLD
CASAS, PAULA CASAS, ROBERT SHIPP,
MARIA SHIPP, MIGUEL LOPEZ, HERSHAL
FRAZIER, ISAAC ROCHA, JACKIE ROCHA
LOUIE GONZALEZ,

PLAINTIFFS

V.

REDMAN HOMES, INC. A/K/A REDMAN
HOUSING, TITAN HOMES, INC.,
OAKMAN HOMES, INC. D/B/A OAKWOOD
MOBILE HOMES, INC., SOUTHERN
HOMES, PALM HARBOR HOMES D/B/A
MASTERPIECE HOUSING, CLAYTON
HOMES, INC., SOUTHERN ENERGY
HOMES, INC., SOUTHERN LIFESTYLE
HOMES, INC., BELMONT HOMES, INC.
D/B/A MS BELMONT HOMES, INC.,
DANE ENERGY D/B/A THE HOMEPORT,
LUV MOBILE HOME SALES, CIT GROUP
SALES AND FINANCE, HOMES BY
OAKWOOD, VALUE HOUSING, INC.,
OAKWOOD ACCEPTANCE, CORP.,
GREENPOINT CREDIT, L.L.C. D/B/A
GREENPOINT CREDIT, INC.,
VANDERBILT MORTGAGE & FINANCE,
INC., NATIONS CREDIT AND HOUSING,
INC., UNITED COMPANY FUNDING, INC.,
GREENTREE FINANCIAL SERVICING
CORP.

DEFENDANTS

CIVIL ACTION NO. _____

COUNSEL OF RECORD

Hector P. Gonzales
P.O. Box 3728
Alice, Texas 78333

Attorney for Plaintiffs

**Ed Walton
Law Offices of Ed Walton
8300 Douglas, Ste. 800
Dallas, Texas 75225
(214) 706-9325**

**Attorney for Defendants Clayton Homes,
Inc., Luv Mobile Home Sales, and
Vanderbilt Mortgage and Finance, Inc.**

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JAIME VALENZUELA, ANNABELLE
IBANEZ, ESMERALDA ALFARO, ARNOLD
CASAS, PAULA CASAS, ROBERT SHIPP,
MARIA SHIPP, MIGUEL LOPEZ, HERSHAL
FRAZIER, ISAAC ROCHA, JACKIE ROCHA
LOUIE GONZALEZ,

PLAINTIFFS

V.

REDMAN HOMES, INC. A/K/A REDMAN
HOUSING, TITAN HOMES, INC.,
OAKMAN HOMES, INC. D/B/A OAKWOOD
MOBILE HOMES, INC., SOUTHERN
HOMES, PALM HARBOR HOMES D/B/A
MASTERPIECE HOUSING, CLAYTON
HOMES, INC., SOUTHERN ENERGY
HOMES, INC., SOUTHERN LIFESTYLE
HOMES, INC., BELMONT HOMES, INC.
D/B/A MS BELMONT HOMES, INC.,
DANE ENERGY D/B/A THE HOMEPORT,
LUV MOBILE HOME SALES, CIT GROUP
SALES AND FINANCE, HOMES BY
OAKWOOD, VALUE HOUSING, INC.,
OAKWOOD ACCEPTANCE, CORP.,
GREENPOINT CREDIT, L.L.C. D/B/A
GREENPOINT CREDIT, INC.,
VANDERBILT MORTGAGE & FINANCE,
INC., NATIONS CREDIT AND HOUSING,
INC., UNITED COMPANY FUNDING, INC.,
GREENTREE FINANCIAL SERVICING
CORP.

DEFENDANTS

CIVIL ACTION NO. _____

INDEX OF MATTERS BEING FILED

Civil Cover Sheet

Notice of Removal

District Clerk's Case Summary (Computer Generated)

District Clerk's Civil Docket

Plaintiff's Original Petition

Certificate of Service by Certified Mail

Citations for Service

**Motion to Transfer Venue and Subject Thereto, Original Answer of Clayton Homes, Inc., Luv
Mobile Home Sales and Vanderbilt Mortgage and Finance, Inc.**